



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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2 TO: The Commission
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4 FROM: Lisa J. Stevenson
5 Acting General Counsel
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10 BY: Jin Lee *JL*
11 Acting Assistant General Counsel
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16 SUBJECT: MUR 6724 (Bachmann for President, *et al.*)
17 Pre-Probable Cause Conciliation
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19 **I. INTRODUCTION**
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21 On June 16, 2016, the Commission found reason to believe that 2012 presidential candidate
22 Michele Bachmann's principal campaign committee, Bachmann for President and Nancy H.
23 Watkins in her official capacity as treasurer (the "Committee"), violated 52 U.S.C.
24 §§ 30104(b)(5), 30116(f), and 30104(b)(2)(D) by failing to properly disclose its disbursements
25 and accepting and failing to report excessive in-kind contributions. The Commission also found
26 reason to believe that Bachmann's leadership committee, Many Individual Conservatives
27 Helping Elect Leaders Everywhere PAC and Barry Arrington in his official capacity as treasurer
28 ("MichelePAC"),¹ violated 52 U.S.C. §§ 30104(b)(5) and 30116(a)(2)(A) by failing to properly
29 disclose its disbursements and making excessive in-kind contributions.²

30 The Commission authorized the Office of the General Counsel to settle this matter
31 through pre-probable cause conciliation and approved proposed conciliation agreements.³
32 Attached are revised agreements negotiated with Respondents which would resolve the

¹ Christopher Marston was not the treasurer for MichelePAC or the Committee when the matters were initiated.

² Certification, MURs 6724 and P-MUR 560 (Bachmann for President, *et al.*) (June 17, 2016).

³ Certification, MUR 6724 (Aug. 1, 2016); see Memorandum to the Commission, MUR 6724 (July 26, 2016).

violations. For the reasons set forth below, we believe the attached agreements with the Committee and MichelePAC represent reasonable settlements under the circumstances presented in this matter, and we recommend that the Commission accept them and close the file.

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Therefore, we
recommend that the Commission accept the attached signed conciliation agreements with
Respondents, approve the appropriate letters, and close the file.¹⁰

III. RECOMMENDATIONS

1. Accept the attached signed conciliation agreement with Bachmann for President and Christopher Marston in his official capacity as treasurer.
2. Accept the attached signed conciliation agreement with MichelePAC and Christopher Marston in his official capacity as treasurer.
3. Approve the appropriate letters.
4. Close the file.

¹⁰ The statute of limitations for the remaining activity begins to expire on August 3, 2017, and all violations will expire on September 28, 2017.